EXHIBIT

1

Thomson Econometrics & Employment Research

2350 Franklin Road, Suite 200 Bloomfield Hills, Michigan 48302

> Phone (248) 292-0208 Fax (248) 292-0211

Michael H. Thomson, Ph.D. Nitin V. Paranjpe, Ph.D. Martin M. Wing, Ph.D. (1958-2008)

October 23, 2018

David A. Nacht Nacht Law, P.C. 101 N. Main Street, Suite 555 Ann Arbor, Michigan 48104

Report regarding Lost Earnings - Abdullah Haydar

Dear Mr. Nacht:

The purpose of this correspondence is to provide you with a report which explains my opinions, and the basis and reasons behind them. To begin, I have obtained the following information and documents:

- 1. Background information for the Abdullah Haydar date of birth, date of hire, date of termination, race, education, occupation, area of residence, etc.
- 2. A copy of Plaintiff's Complaint and Jury Demand, and Stipulated Protective Order.

 (Please treat this report as confidential, and entirely subject to the protective order.)
- 3. Earnings information of comparable employees in L7 and L8 at Amazon, for years 2014 2018, as contained within documents numbered 00008411 and 00008898. For the purposes of this report, I have been asked to consider Mr. Cohen and Mr. Garibay as comparable L7 employees, and Mr. Gaw and Mr. Mosby as comparable L8 employees.

- 4. Plaintiff's W2 statements, for 2012 2017.
- 5. Plaintiff's tax returns, for 2012 2015.
- 6. Plaintiff's resume (dated sometime after July, 2016).
- 7. A copy of plaintiff's hire letter from Amazon (with start date of November 19, 2012), dated October 11, 2012.
- 8. Information regarding Amazon RSU/stock program (including vesting schedule of RSU's granted to plaintiff at time of hire), and Vison and Health plans.
- 9. A copy of plaintiff's employment file from FarmLogs/AgriSight, Inc.
- 10. A copy of plaintiff's employment file from HookLogic/Criteo.
- 11. A copy of plaintiff's hire letter from Linked (with start date of August 13, 2018), dated July 30, 2018
- 12. Deposition transcript of Jennifer Johahnson, dated November 8, 2017.
- 13. Life Expectancy information from: "United States Life Tables, 2014," U.S. Department of Health & Human Services, National Vital Statistics Reports, Volume 66, Number 4, August 14, 2017, tables 2 and 14; and from the: "Social Security Life Expectancy Calculator;" http://www.socialsecurity.gov/OACT/population/longevity.html.

There are 4 Attachments at the end of this report:

- A. Lost Earnings Charts.
- B. Inflation Charts.
- C. Curriculum Vitae.
- D. Case List.

The first attachment contains six charts. The first three charts contain graphs which illustrate the annual differences in Mr. Haydar's earnings at Amazon and his earnings since he was terminated at Amazon. There are 3 alternative graphs: i) using two other L7 employees (Cohen & Garibay) as earnings comparables, ii) using L8 employee "G" (Gaw) as an earnings comparable, and iii) using L8 employee "M" (Mosby) as an earnings comparable. The fourth through sixth charts in Attachment A contain the quantitative details of my opinions, and they utilize the same three alternatives/comparables (as explained above). The major assumptions are provided in the footnotes at the bottom of each of the last three charts. Please note that all six of the charts are preliminary in the sense that if additional and/or updated information is obtained, I would like to have the opportunity to amend or update the calculations, if necessary. Also, since a significant portion of the compensation in this case is dependent upon the price/value of Amazon and Microsoft stocks, the calculations can be updated to reflect their latest market values. Based upon today's market prices, the values used in this report are \$1,755/share for Amazon, and \$107/share for Microsoft.

The first chart in Attachment A contains a graph which illustrates Mr. Haydar's lost earnings, under an assumption that he would have continued with his employment at Amazon, without any past or future promotion(s). The taller/gray bars show the actual earnings of the two L7 comparable employees up to 2017, and then their anticipated compensation for 2018 - 2020 (assuming no change in Amazons stock price from \$1,755/share). The highest and longest blue line shows the trend in the L7 comparables' earnings from Amazon based on their compensation for years 2013 – 2020. The extended blue line with "+" marks shows my forecast of their

anticipated compensation at Amazon for years 2021 – 2025. I based this forecast on their granted compensation from Amazon for this year (2018), with a valuation for Amazon stock at the time it was granted. Therefore, this should be reasonable measure of what the managers at Amazon believe is an appropriate level of earnings for these two employees. Over time, I do factor in a 4.0% per year adjustment for long-run wage inflation, and I use this adjustment for both salary and stock compensation at Amazon. Since the "Forecast Before" (blue line with "+" marks) is: i) less than past compensation at Amazon, ii) less than the trend of compensation at Amazon, and iii) includes only 4.0% growth in Amazon stock value, it is my opinion that this is a reasonable and conservative forecast of compensation for Mr. Haydar (if he had initially remained employed at Amazon).

Mr. Haydar's earnings since being terminated at Amazon are also illustrated in the first chart in Attachment A. The red bars show his actual earnings from FarmLogs/AgriSight,

HookLogic/Criteo, and LinkedIn/Microsoft up to today, and also his anticipated earnings at LinkedIn/Microsoft, assuming his employment continues to at least 2022. The figures from 2018 through 2022 are based upon his LinkedIn salary of \$220,000, the RSU/stock he was granted at the time of hire (which has a four-year vesting period), along with the same 4.0% per year adjustment for changes in earnings over time. The shorter green line with "+" marks shows my forecast for Mr. Haydar's earnings if he continues his salaried earnings (based on \$220,000 in 2018 dollars), along with 4.0% increases over time. I have no basis to include any future earnings from potential promotion(s) and/or stock grants, as Mr. Haydar has no expectation of ever receiving such at LinkedIn. At the time of this report, he has only been employed at Linked in for about three months.

The second and third charts contain similar graphs, except that Mr. Haydar's lost earnings are based upon different comparables – Mr. "G" and Mr. "M", respectively. Each of these two Amazon employees has been promoted to L8. The differences in earnings between Mr. Haydar and these employees are greater than those seen in the first chart, because these two employees have received more RSUs/stock than the L7 employees.

The specific calculations for Abdullah Haydar's loss of earnings are contained in the fourth through sixth charts in Attachment A. In each chart, columns 1 and 2 provide Mr. Haydar's age and the corresponding year, respectively. The figures in column 3 are based upon the explanation given previously for the respective comparable employees – i.e., actual earnings up to 2017, anticipated earnings for 2018, 2019, and 2020 (based upon RSU/stock previously granted), and then anticipated earnings for years after 2020 (based upon earnings and stock valued at the time it was granted in 2018). This approach effectively removes Amazon stock appreciation (after the time it was granted) from being factored into future Amazon comparable earnings. The figures in column 4 are based upon Mr. Haydar's actual earnings up to today, and then his anticipated earnings based upon his latest employment circumstances and earnings from LinkedIn. Column 5 contains the year-by-year annual loss in earnings, and then the reduction to present value (per Michigan statute) is presented in columns 6 and 7. In this case, the reduction to present value has been performed with a 5.0% compound discount rate.

Based upon the assumptions and projections discussed above, the present value of Abdullah Haydar's lost earnings is projected to be \$5,181,145 without factoring in any promotion(s), and

then from \$9,648,981 - \$11,321,792 with consideration of a promotion to L8. A significant amount of the lost earnings has already been experienced by Mr. Haydar, as past losses range from \$2.2 to \$3.0 million dollars.

The remaining attachments are as follows: Attachment B contains 12 charts which are related to the issue of long-run inflation; Attachment C contains a copy of my CV, and Attachment D contains a list of the cases in which I have provided testimony over the last several years.

In Attachment B, the first 6 bar charts illustrate the effects of long-run inflation in different areas of the U.S. economy. Inflation does affect the prices of nearly all goods and services, although not in exactly the same magnitude, of course. The historical information which is set forth in these charts provides a foundation for making inferences about the future course of inflation. Over the past 30 years, average annual increases have been: 2.7% for overall consumer prices, 4.7% for medical care, and 3.6% for wages.

The 7th bar chart in Attachment B illustrates one of the coming changes in the age distribution of the U.S. population. Over the last 30+ years, post WWII "baby boomers" have been in the primary working age population group (i.e., between the ages of 20-65). However, over the next 15-20 years, most of these so-called "baby-boomers" will retire (as they enter the 65+ age group). The ratio of the working-age population relative to the retiree-age population will shift from about 5-to-1, to under 3-to-1. This shift will have significant effects in the labor market, including: i) an increase in the demand for many services (especially medical, caretaking, and

household services), and ii) a decrease in the supply of workers, as relatively more workers will

be leaving the labor force. For each of these reasons, there will be upward pressure on economy-

wide wages. Therefore, individuals entering or remaining in the workforce can expect relatively

good job prospects, and relatively high growth rates in wages and compensation for the

foreseeable future.

The remaining 5 charts in Attachment D collectively show that a 4.0% long-run average increase

is: i) conservative when compared to the U.S. Social Security Administration's long-run

forecasts for labor market compensation, and ii) likely to be conservative regardless of one's

level of education.

Finally, regarding my fees for this particular case, you should be aware that the charge for my

time is \$750/hour. At the present time, I have worked approximately 20 hours on this case.

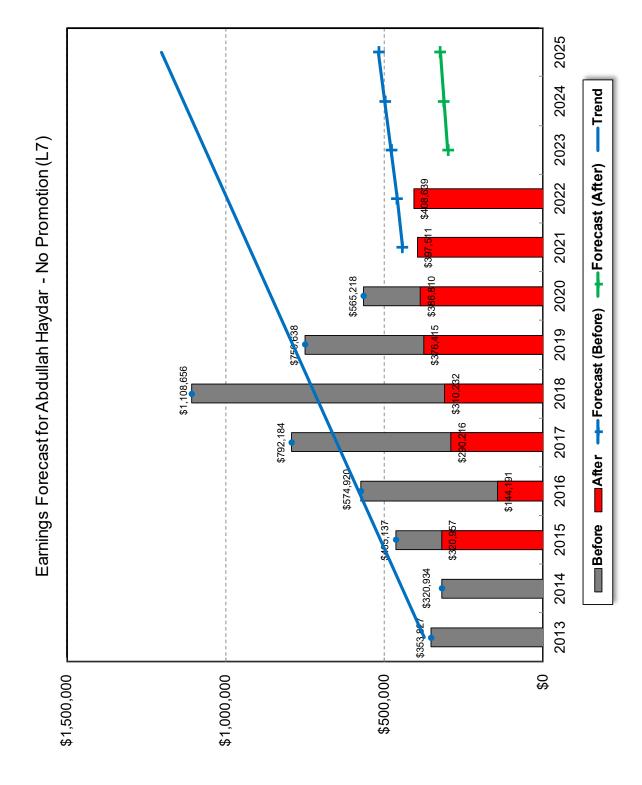
Please contact me if you have any questions.

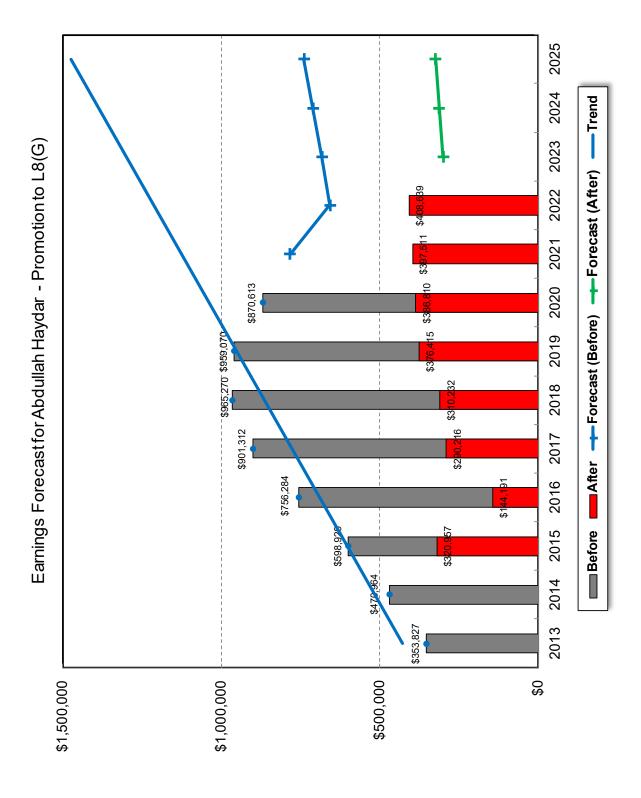
Respectfully,

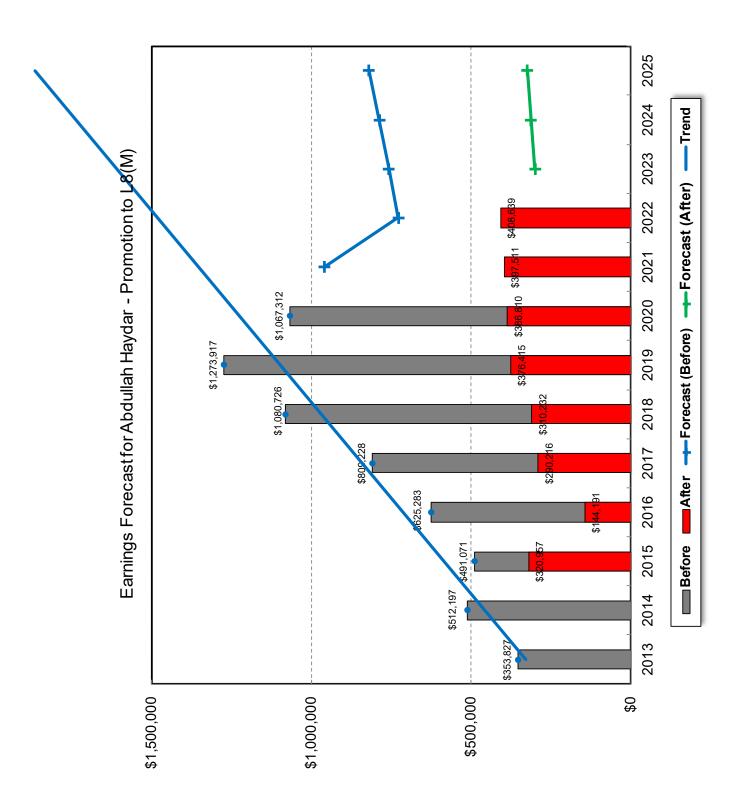
Michael H. Thomson, Ph.D.

Attachment A

Lost Earnings Charts







Preliminary Calculation of Lost Earnings - No Promotion (L7) Re: Abdullah Haydar

by: Michael H. Thomson, Ph.D.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	
		Projected	Earnings	Annual	Discount	Present	
<u>Age</u>	<u>Year</u>	<u>Before</u>	<u>After</u>	Loss	Factor	<u>Value</u>	
38	2013	\$353,827	\$353,827	\$0	1.00	\$0	
39	2014	\$320,934	\$320,934	\$0	1.00	\$0	
40	2015	\$465,137	\$320,957	\$144,180	1.00	\$144,180	
41	2016	\$574,920	\$144,191	\$430,729	1.00	\$430,729	
42	2017	\$792,184	\$290,216	\$501,968	1.00	\$501,968	
43	2018	\$1,108,656	\$310,232	\$798,424	1.00	\$798,424	
44	2019	\$750,638	\$376,415	\$374,224	1.00	\$374,224	
45	2020	\$565,218	\$386,810	\$178,408	1.05	\$169,912	
46	2021	\$443,201	\$397,511	\$45,691	1.10	\$41,443	
47	2022	\$460,930	\$408,639	\$52,291	1.16	\$45,171	
48	2023	\$479,367	\$300,907	\$178,460	1.22	\$146,819	
49	2024	\$498,541	\$312,943	\$185,598	1.28	\$145,421	
50	2025	\$518,483	\$325,461	\$193,022	1.34	\$144,036	
51	2026	\$539,222	\$338,480	\$200,743	1.41	\$142,664	
52	2027	\$560,791	\$352,019	\$208,772	1.48	\$141,305	
53	2028	\$583,223	\$366,100	\$217,123	1.55	\$139,960	
54	2029	\$606,552	\$380,744	\$225,808	1.63	\$138,627	
55	2030	\$630,814	\$395,973	\$234,841	1.71	\$137,306	
56	2031	\$656,046	\$411,812	\$244,234	1.80	\$135,999	
57	2032	\$682,288	\$428,285	\$254,004	1.89	\$134,704	
58	2033	\$709,580	\$445,416	\$264,164	1.98	\$133,421	
59	2034	\$737,963	\$463,233	\$274,730	2.08	\$132,150	
60	2035	\$767,482	\$481,762	\$285,720	2.18	\$130,891	
61	2036	\$798,181	\$501,032	\$297,148	2.29	\$129,645	
62	2037	\$830,108	\$521,074	\$309,034	2.41	\$128,410	
63	2038	\$863,312	\$541,917	\$321,396	2.53	\$127,187	
64	2039	\$897,845	\$563,593	\$334,251	2.65	\$125,976	
65	2040	\$933,759	\$586,137	\$347,622	2.79	\$124,776	
66	2041	\$971,109	\$609,583	\$361,526	2.93	\$123,588	
67	2042	\$925,791	\$581,135	\$344,655	3.07	\$112,210	
		Past:		\$2,249,525		\$2,249,525	
		Future:		\$5,559,241		\$2,931,621	
		Totals:		\$7,808,766		\$5,181,145	
	Footne	ntes:					
1. Cal		begin at:				January 1, 2014	
2. Calculations end at:						November 30, 2042	
3. Date of birth:						November 6, 1975	
4. (LR) Earnings "Before" based on 2018 Amazon earnings granted:						\$394,005	
5. (LR) Earnings "After" based on 2018 LinkedIn earnings granted :					\$253,000		
6. Adjustment for future earnings growth/inflation:						4.0%	
	ustment		0.0%				
	3. Future amounts are reduced to present value, via: MCL 600.6306(2).						

2. Preliminary Calculation of Lost Earnings - L8 (G) Re: Abdullah Haydar

by: Michael H. Thomson, Ph.D.

(1)	(2)	(3)	(4)	(5)	(6)	(7)
. ,		Projected		Annual	Discount	Present
Age	Year	<u>Before</u>	After	<u>Loss</u>	Factor	<u>Value</u>
38	2013	\$353,827	\$353,827	\$0	1.00	\$0
39	2014	\$470,964	\$320,934	\$150,030	1.00	\$150,030
40	2015	\$598,929	\$320,957	\$277,972	1.00	\$277,972
41	2016	\$756,284	\$144,191	\$612,093	1.00	\$612,093
42	2017	\$901,312	\$290,216	\$611,096	1.00	\$611,096
43	2018	\$965,270	\$310,232	\$655,038	1.00	\$655,038
44	2019	\$959,070	\$376,415	\$582,655	1.00	\$582,655
45	2020	\$870,613	\$386,810	\$483,803	1.05	\$460,765
46	2021	\$783,552	\$397,511	\$386,041	1.10	\$350,151
47	2022	\$657,176	\$408,639	\$248,537	1.16	\$214,696
48	2023	\$683,463	\$300,907	\$382,556	1.22	\$314,730
49	2024	\$710,802	\$312,943	\$397,858	1.28	\$311,732
50	2025	\$739,234	\$325,461	\$413,773	1.34	\$308,764
51	2026	\$768,803	\$338,480	\$430,324	1.41	\$305,823
52	2027	\$799,555	\$352,019	\$447,537	1.48	\$302,910
53	2028	\$831,538	\$366,100	\$465,438	1.55	\$300,026
54	2029	\$864,799	\$380,744	\$484,056	1.63	\$297,168
55	2030	\$899,391	\$395,973	\$503,418	1.71	\$294,338
56	2031	\$935,367	\$411,812	\$523,555	1.80	\$291,535
57	2032	\$972,781	\$428,285	\$544,497	1.89	\$288,758
58	2033	\$1,011,693	\$445,416	\$566,277	1.98	\$286,008
59	2034	\$1,052,160	\$463,233	\$588,928	2.08	\$283,284
60	2035	\$1,094,247	\$481,762	\$612,485	2.18	\$280,586
61	2036	\$1,138,017	\$501,032	\$636,984	2.29	\$277,914
62	2037	\$1,183,537	\$521,074	\$662,464	2.41	\$275,267
63	2038	\$1,230,879	\$541,917	\$688,962	2.53	\$272,646
64	2039	\$1,280,114	\$563,593	\$716,521	2.65	\$270,049
65	2040	\$1,331,318	\$586,137	\$745,181	2.79	\$267,477
66	2041	\$1,384,571	\$609,583	\$774,989	2.93	\$264,930
67	2042	\$1,319,958	\$581,135	\$738,822	3.07	\$240,539
		Past:		\$2,888,884		\$2,888,884
		Future:		\$12,443,003	_	\$6,760,096
		Totals:		\$15,331,888		\$9,648,981
	Footn	ntes:				
1. Cal	Footnotes: 1. Calculations begin at: January 1, 201					January 1, 2014
Calculations end at:						November 30, 2042
	e of birth					November 6, 1975
	4. (LR) Earnings "Before" based on 2018 Amazon earnings granted:					\$561,757
						\$253,000
		for future earnin				4.0%
		for fringe benefi				0.0%
	B. Future amounts are reduced to present value, via: MCL 600.6306(2).					

3. Preliminary Calculation of Lost Earnings - L8 (M) Re: Abdullah Haydar

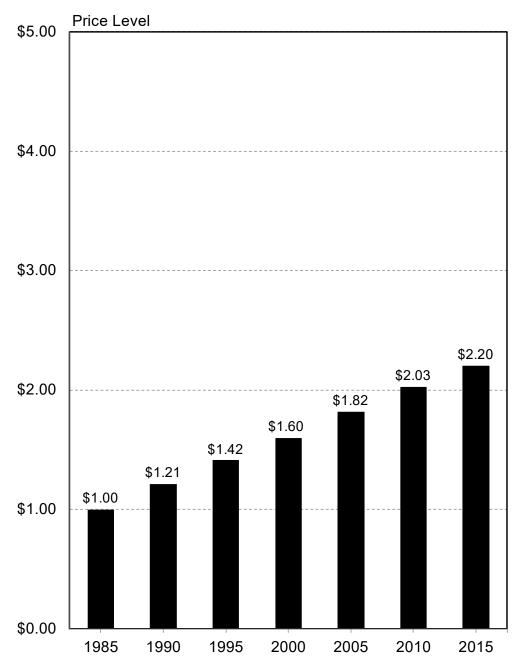
by: Michael H. Thomson, Ph.D.

(1)	(2)	(3)	(4)	(5)	(6)	(7)
(.,	_/		l Earnings	Annual	Discount	Present
Age	Year	Before	After	Loss	Factor	<u>Value</u>
38	2013	\$353,827	\$353,827	\$0	1.00	\$0
39	2014	\$512,197	\$320,934	\$191,263	1.00	\$191,263
40	2015	\$491,071	\$320,957	\$170,114	1.00	\$170,114
41	2016	\$625,283	\$144,191	\$481,092	1.00	\$481,092
42	2017	\$809,228	\$290,216	\$519,012	1.00	\$519,012
43	2018	\$1,080,726	\$310,232	\$770,494	1.00	\$770,494
44	2019	\$1,273,917	\$376,415	\$897,503	1.00	\$897,503
45	2020	\$1,067,312	\$386,810	\$680,501	1.05	\$648,097
46	2021	\$960,581	\$397,511	\$563,070	1.10	\$510,721
47	2022	\$729,156	\$408,639	\$320,518	1.16	\$276,875
48	2023	\$758,323	\$300,907	\$457,416	1.22	\$376,317
49	2024	\$788,656	\$312,943	\$475,712	1.28	\$372,733
50	2025	\$820,202	\$325,461	\$494,741	1.34	\$369,183
51	2026	\$853,010	\$338,480	\$514,530	1.41	\$365,667
52	2027	\$887,130	\$352,019	\$535,112	1.48	\$362,185
53	2028	\$922,616	\$366,100	\$556,516	1.55 1.63	\$358,735
54 55	2029	\$959,520	\$380,744	\$578,777		\$355,319
55 56	2030	\$997,901 \$1,037,817	\$395,973	\$601,928	1.71 1.80	\$351,935
56 57	2031	\$1,037,817	\$411,812 \$428,285	\$626,005 \$651,045	1.89	\$348,583 \$345,263
58	2032	\$1,079,330	\$445,416	\$677,087	1.98	\$343,203
59	2034	\$1,167,403	\$463,233	\$704,170	2.08	\$338,718
60	2035	\$1,214,099	\$481,762	\$732,337	2.18	\$335,492
61	2036	\$1,262,663	\$501,032	\$761,631	2.29	\$332,297
62	2037	\$1,313,170	\$521,074	\$792,096	2.41	\$329,132
63	2038	\$1,365,696	\$541,917	\$823,780	2.53	\$325,998
64	2039	\$1,420,324	\$563,593	\$856,731	2.65	\$322,893
65	2040	\$1,477,137	\$586,137	\$891,000	2.79	\$319,818
66	2041	\$1,536,223	\$609,583	\$926,640	2.93	\$316,772
67	2042	\$1,464,532	\$581,135	\$883,397	3.07	\$287,609
		Past:		\$3,029,478		\$3,029,478
		Future:		\$15,104,738		\$8,292,315
		Totals:		\$18,134,216		\$11,321,792
	Footnotes:					
		begin at:				January 1, 2014
	culations					November 30, 2042
	3. Date of birth:					November 6, 1975
	4. (LR) Earnings "Before" based on 2018 Amazon earnings granted: 5. (LR) Earnings "After" based on 2018 LinkedIn earnings granted:					\$623,286
	<i>_</i>				nieu :	\$253,000 4.0%
	6. Adjustment for future earnings growth/inflation: 4.0% 7. Adjustment for fringe benefits: 0.0%					
	8. Future amounts are reduced to present value, via: MCL 600.6306(2).					
o. rull	5. Future amounts are reduced to present value, via. MCL 000.0300(2).					

Attachment B

Inflation Charts

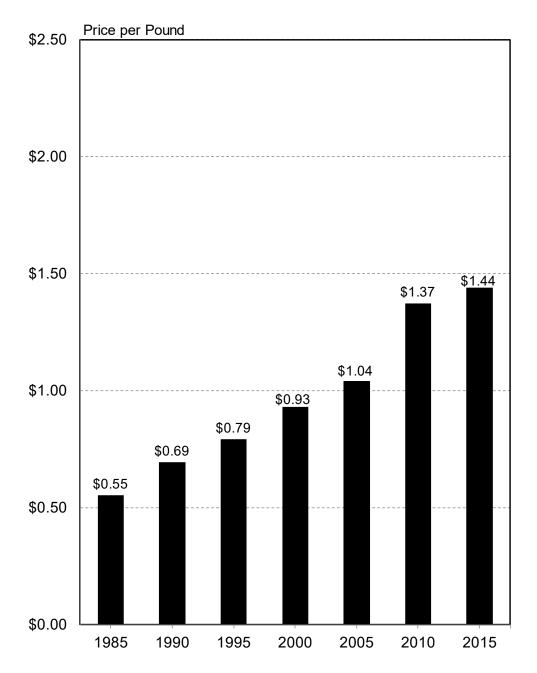
Consumer Prices over the past 30 years



Note: Long Run Inflation Rate of 2.7%.

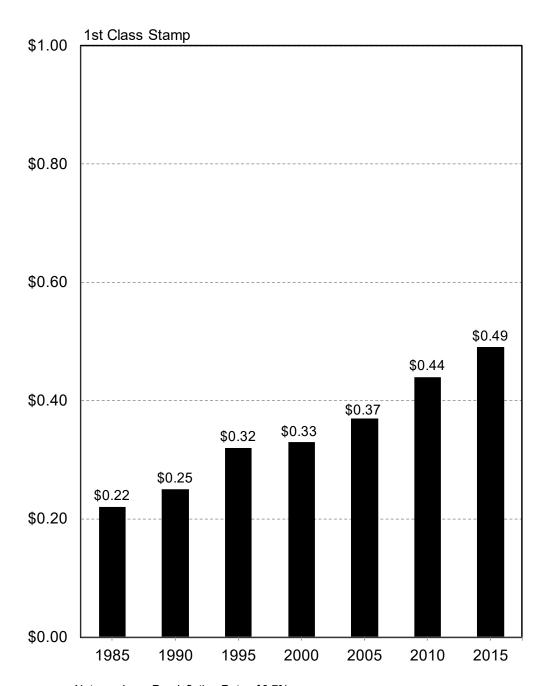
Source: CPI-U, Series CUUR0000SA0, Bureau of Labor Statistics, U.S. Dept. of Labor.

Bread Prices over the past 30 years



Note: Long Run Inflation Rate of 3.2%.
Source: CPI-White Bread, Series APU0000702111, BLS, U.S. Dept. of Labor.

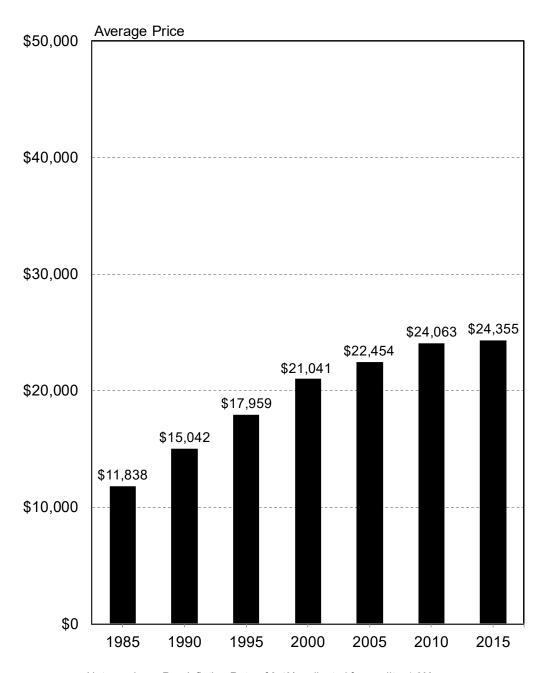
U.S. Postal Rates over the past 30 years



Note: Long Run Inflation Rate of 2.7%.

<u>Source</u>: http://about.usps.com/who-we-are/postal-history/domestic-letter-rates-since-1863.pdf.

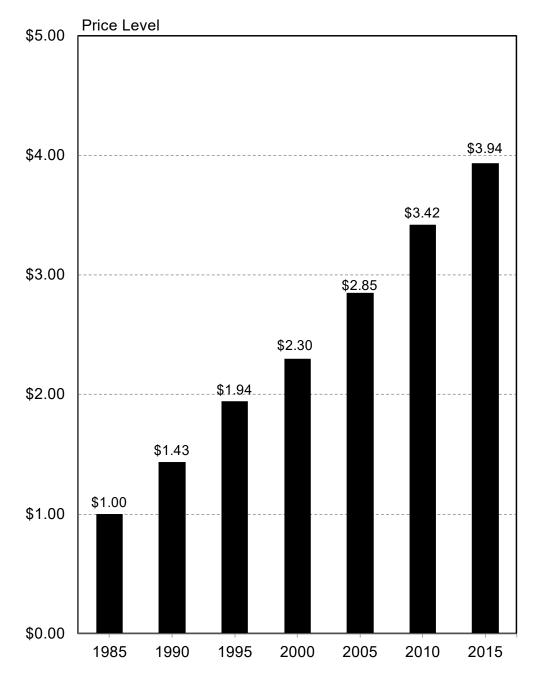
New Car Prices over the past 30 years



Note: Long Run Inflation Rate of 2.4%; adjusted for quality, 1.0%.

Source: Ward's Motor Vehicle Facts and Figures, 2011 and 2016; and
CPI-New Cars, Series CUUR0000SS45011, BLS, U.S. Dept. of Labor.

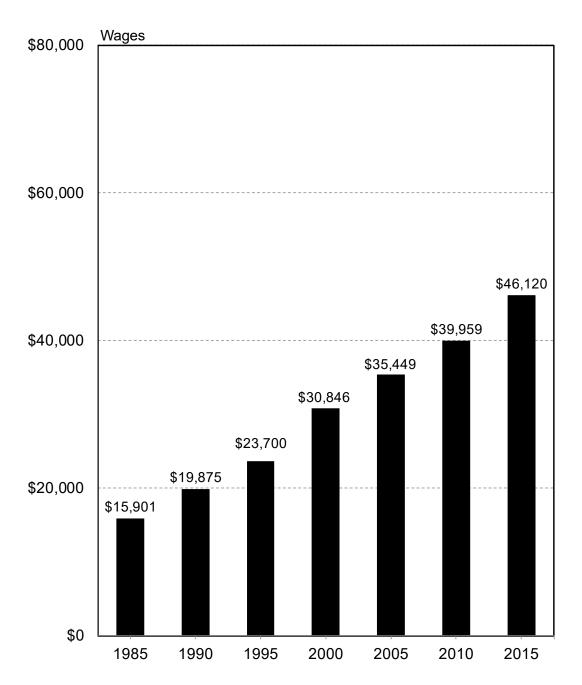
Medical Care Prices over the past 30 years



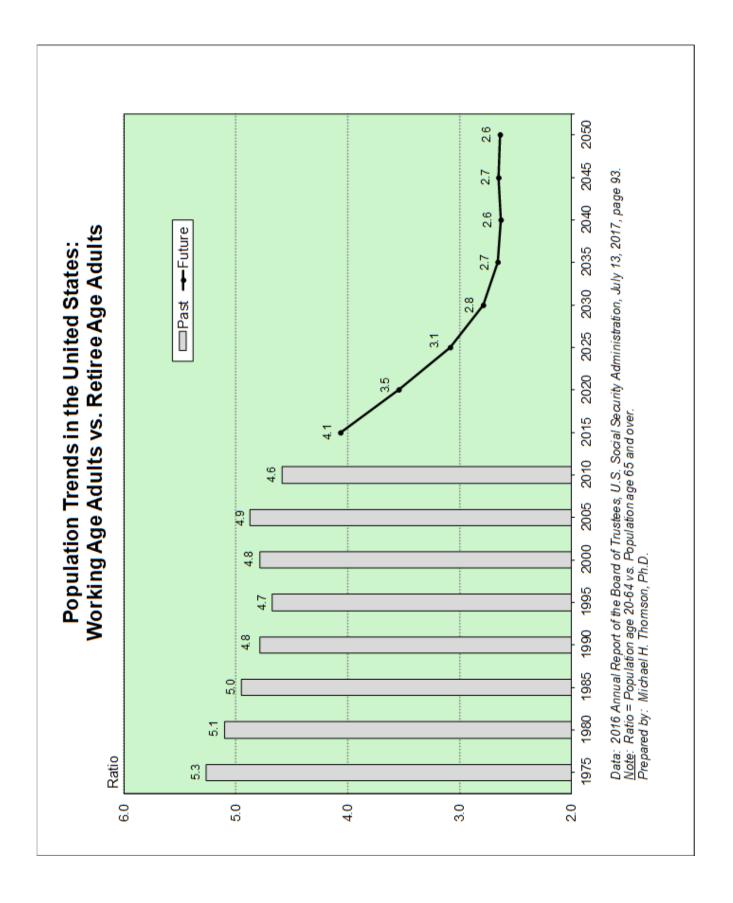
Note: Long Run Inflation Rate of 4.7%.

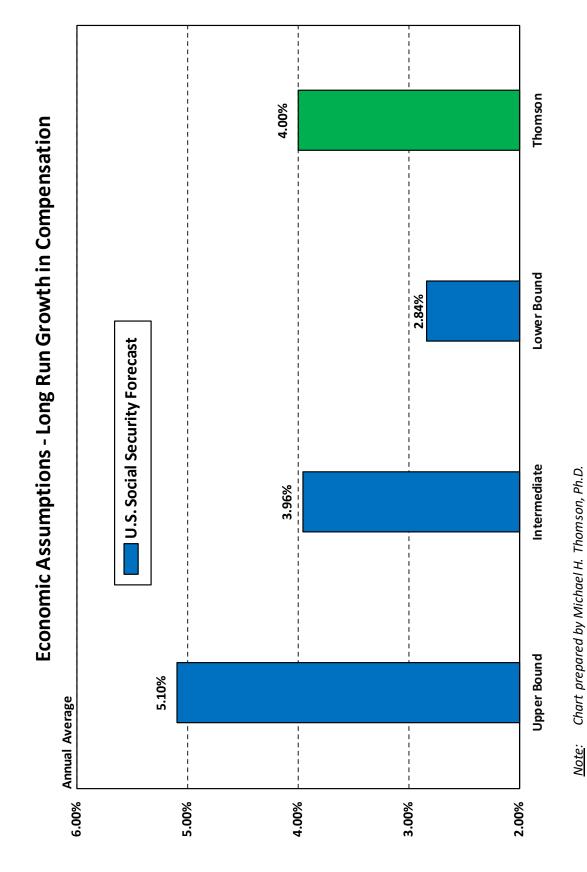
Source: CPI-Medical Care, Series CUUR0000SAM, BLS, U.S. Dept. of Labor.

Average Wages over the past 30 years

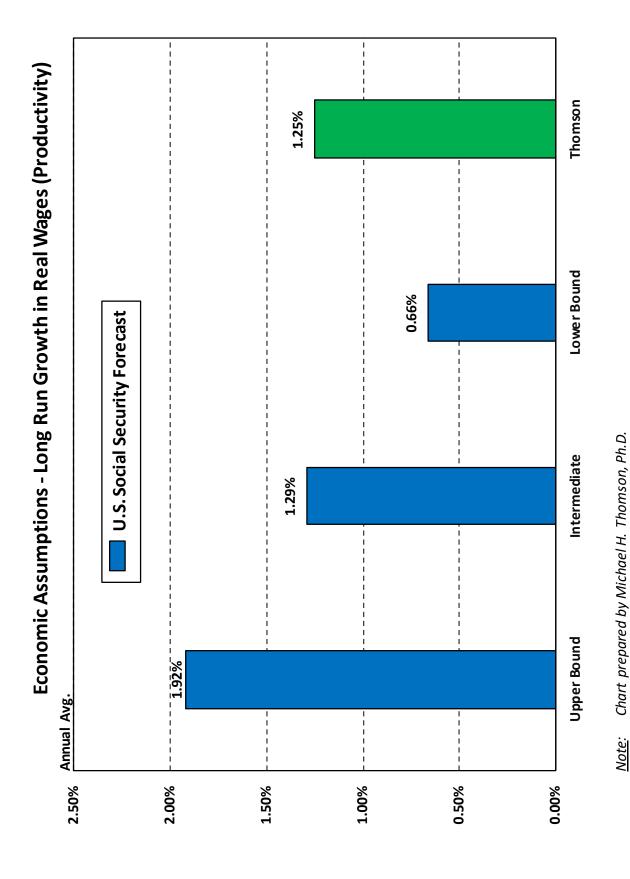


<u>Note</u>: Long Run Growth Rate of 3.6%. <u>Source</u>: Average Wage Index (raw data), U.S. Social Security Administration.



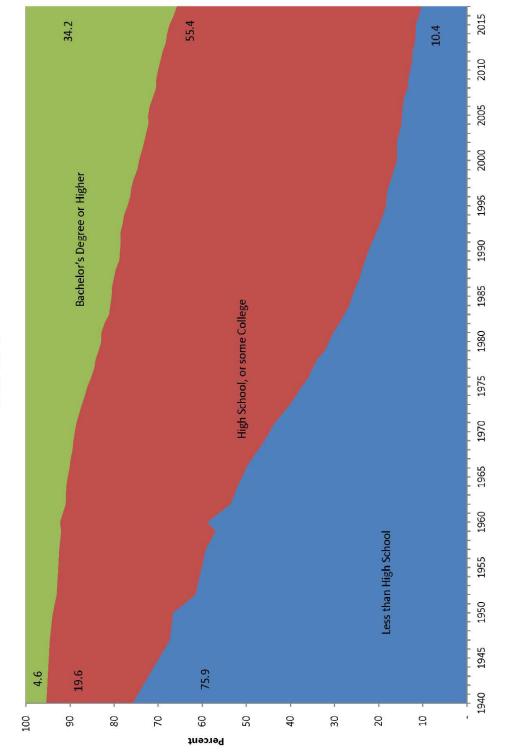


The 2018 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, June 5 2018, pp. 99-106, 216-217. Source:

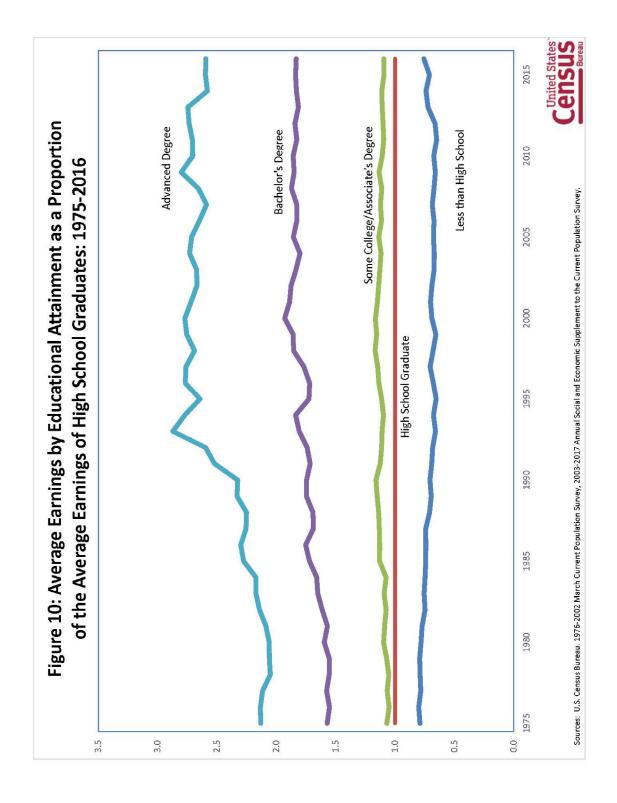


The 2018 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, June 5, 2018, pp. 99-106, 216-217. Source:

Figure 2: Percent of Population Age 25 and over by Educational Attainment: 1940-2017



Sources: U.S. Census Bureau. 1947, 1952-2002 March Current Population Survey, 2003-2017 Annual Social and Economic Supplement to the Current Population Survey; 1940-1960 Census of Population.



2020 Educational Attainment in the U.S. - Years of School Completed, People 25 & Over -More than HS 2010 2000 -HS or Less 1990 1980 1970 1960 1950 1940 %0.0 80.0% %0.09 40.0% 20.0% 100.0%

Note: Chart prepared by Michael H. Thomson, Ph.D. Source: U.S. Census Bureau: 1940-1960 Census of Population, 1947 & 1952-2002 March Current Population Survey, and 2003-2017 Annual Social and Economic Supplement to the Current Population Survey,

Attachment C

Curriculum Vitae

CURRICULUM VITAE

MICHAEL H. THOMSON, Ph.D.

ADDRESS

Thomson Econometrics and Employment Research

2350 Franklin Road, Suite 200 Bloomfield Hills, Michigan 48302

Phone: (248) 292-0208 Fax: (248) 292-0211

EDUCATION

1976 B.A., Economics, Kalamazoo College

Major: Economics

1978 M.A., Economics, Michigan State University1980 Ph.D., Economics, Michigan State University

Dissertation: Least Squares Estimation

Subject to Inequality Constraints.

Fields: Econometrics

Labor Economics

Statistics

ACADEMIC HONORS

Graduate Fellowship, Michigan State University.

The William G. Howard Memorial Prize in Economics and graduated Cum Laude with Honors in Economics, Kalamazoo College.

ACADEMIC EXPERIENCE

1980-1987 Assistant Professor of Economics

Department of Economics Wayne State University

1987-1997 Adjunct Assistant Professor of Economics and

Associate Member of the Graduate Faculty
Department of Finance and Business Economics

Wayne State University

Referee: Journal of Macroeconomics, Wayne State University.

The Review of Economics and Statistics, Harvard University. The Journal of Econometrics, University of Southern California.

MICHAEL H. THOMSON, Ph.D.

CV, Page Two.

PROFESSIONAL EXPERIENCE

1990-Present Partner,

Thomson Econometrics and Employment Research II

1980-1990 Sole Proprietor,

Thomson Econometrics and Employment Research I

Thomson Econometrics and Employment Research is a firm that provides economic and statistical research services to its clients. We also provide computer programming and data processing services. Research has been conducted relative to a broad range of economic and statistical issues, ranging from sophisticated analyses of employment policies and practices (generally regarding discrimination claims), to economic calculations and projections of past and future damages. Damage calculations have included: earnings fringe benefits, pension and structured settlement evaluations, lost sales and profits, business valuations, education valuations, medical expenses, losses due to physical injury and/or disability, and other economic losses. We also provide interested parties with a framework which is useful for evaluating "non-economic" damages, such as pain and suffering, losses of society and companionship, and/or hedonic damages.

PROFESSIONAL MEMBER

The American Economic Association The American Statistical Association The Econometric Society Society of Labor Economists

REFEREED PUBLICATIONS

"A Note on the Comparison of the MSE of ICLS and other Related Estimators", Co-author with Peter Schmidt, **The Review of Economics and Statistics**, Feb. 1982.

"Some Results on the Statistical Properties of an ICLS Estimator in a Linear Model with Two Regressors", **The Journal of Econometrics**, Nov. 1982.

"Computational Issues with Inequality Constraints", Co-author with Peter Schmidt, **Economic Letters**, 1982.

Attachment D

Case List

Code	Year	Plaintiff(s)	Defendant(s)
Dep	2014	Estate of George Abbott, Dec'd	v. Sparrow Hospital, et al.
Dep		Costner	v. William Beaumont Hospital
CA	2014	Hanak, et al.	v. Dyncorp International
Dep	2014	Estate of Robert Mitchell, Dec'd	
Dep		Simi Razvi	
Dep	2014	Estate of Kelly Barnes	v. Sparrow Hospital
Dep	2014	Estate of Jerome Schafer, Dec'd	v. Dr. Hayes, et al.
Arb	2014	Carmen Otero	v. Altman Management Co.
Dep	2014	Alexander Letson, a Minor	v. Patricia Nester
Dep	2014	Carlos Pittman, a Minor	v. Oakwood Hospital
Dep	2014	Mary-Grace Braatz	v. Lansing Ophthalmology, P.C., et al.
Dep	2014	Lieto	v. Joseph Hunt, D.O., et al.
Dep	2014	David Miguel Gonzales, Dec'd	v. Hutzel Hospital, et al.
Dep		Joshua Headford	v. Brett Carden, et al.
Dep	2014	Estate of Douglas Killingbeck	v. Michael Przydatek
Dep	2014	Belanger	v. Simply Better Management Co.
Dep		Carrie Braspenick	v. Aspirus Grand View Hospital
Dep		Rene Chamberlin	v. Bronson Methodist Hospital, et al.
Dep	2014	Diana Johnston	v. Genesys Regional Medical Ctr, et al.
Dep	2014	Christopher Goldsmith	v. Quick Care Family Medical Ctr, et al.
Dep		Estate of Donald Alexander	v. Gull Road Medical Practice, P.C., et al.
Dep	2014	Carlos Pittman, a Minor	v. Oakwood Hospital
Dep		Willard Cole	v. Mercy Health Partners, et al.
Dep	2014	Digby Maring, a Minor	
Dep		Chase Smitterberg, a Minor	v. Dr. Susan Mosier-LaClair, M.D.
Dep		Richard B. Ziglar	v. Carpenter, M.D. et al.
Dep		Bazzo	v. Alpena General Hospital, et al.
Dep	2014	Donaldson	v. Trinity
Dep	2014	Rebecca Eakes	v. Genesys Regional Medical Ctr, et al.
CA	2014	Carrie Braspenick	v. Aspirus Grand View Hospital
CA	2014	Ken Pilarski	v. DMC
Dep	2014	Kenneth Carrier	v. Botsford Hospital, et al.
CA	2014	William Dunn	v. Echo Valley Condominiums
Dep	2014	Krista Robinson, a Minor	v. William Beaumont Hospital, et al.
CA	2014		v. Motorist Mutual Insurance Co., et al.
Dep	2014	Estate of Tatum Dull, Deceased	v. Hurley Medical Ctr, et al.
Dep	2014	Alexis King, a Minor	v. Hutzel Hospital, et al.
Dep	2014	Dimitrious Flerianos	v. William Pittas
Dep	2014	Anika Sproul, a Minor	v. Fort Madison Community Hospital, et al.
CA	2014	Costner	v. William Beaumont Hospital
Dep	2014	Est. of Luigi Paese, Dec'd	v. St. Joseph Mercy Hospital
Dep		Brenda Johnson	v. Smima Suen, DPN
Dep		Ricky Van Boxtel	v. Calvin Nogler, M.D., et al.
Dep		Christina Hamilton	
Dep		Poulos, et al.	v. Paschen, Nielsen & Assoc., LLC
Dep		Richard Papp	v. Oakwood Healthcare, Inc., et al.
Dep		Latoya Butler, Dec'd	
Dep		Katherine Hill	v. Jiab Suleiman, D.O.
Dep		Est. of Craig Yacuone, Dec'd	v. St. John Hospital, et al.

Dan	2011	Catharina D. Cula	y Dr. Veyre et el
Dep		Catherine D. Culp	v. Dr. Veyna, et al.
Dep		Stacey White	v. St. Mary's Hospital of MI, PLLC, et al.
Dep		Michael Joseph Outram	v. AGT Flip City Entertainment, LLC
Dep		Rahim Abdullah	v. Lakeland Regional Medical Ctr, et al.
Dep		Robbie Jean Tewsley	v. St. John Macomb-Oakland Hosp., et al.
Dep		Est.of Sarah Lynn Hoffman, Dec'd	v. Bell Memorial Hospital, et al.
Dep		Est. of Eric Mason, Dec'd	v. PGT Trucking
Dep		Rebecca Kozin	v. Oleh J. Bolukh, M.D., et al.
Dep		Shakir Zora, a Minor	v. St. John Macomb Hospital, et al.
Dep	2014	Javen Carlton, a Minor	v. St. John Hospital, et al.
Dep	2014	Richard Couture	v. William Beaumont Hospital, et al.
Dep	2014	Fountain/Kerschenheiter, Dec'd.	v. Katz, D.O. et al.
Dep	2014	Jack Ruesink, a Minor, Dec'd	v. Bixby Medical Ctr, et al.
Dep	2014	Martha Shaw	v. Saginaw Valley Neurosurgery, et al.
Dep	2014	Brenda Meyers	v. Dr. Chang, et al.
Dep	2014	Anthony Moon, a Minor	v. Davita
Dep	2014	Ronald Bamberg	v. Dr. Richardson, et al.
Dep	2014	Susan Swider	v. Edgewood Country Club, et al.
Dep	2014	Troy Tooke	v. Canadian Pacific Railway
Dep	2014	John Bloomquist	v. Sparrow Health System
Dep		Caleb Klein, a Minor	v. Full Spectrum Family, P.C., et al.
Dep	2014	Est. of Jim and Beth Judson	v. United States of America
Dep	2014	Mario Palacios	v. United States
Dep	2014	Katie Lamb	v. Sparrow Hospital, et al.
Dep		Est. of Barbara Hendrick, Dec'd	v. McLaren Regional Hospital, et al.
Dep		Est. of Elmo Lee, Dec'd	v. Detroit Receiving Hospital, et al.
CA		Digby Maring, a Minor	v. Advantage Health
Dep		Carolyn Wright	v. Cam Hiltz Trucking & Paul Hayward
Dep		Est. of Daniel Keleel, Dec'd	v. Henry Ford Macomb Hospital, et al.
Dep		Est. of Brian Slade, Dec'd	v. Mercy Health Partners, et al.
Dep		Julie Shaw	v. Dr. Chicorel, et al.
Dep		Karen Stroup	v. Borgess Medical Ctr
Dep		Melissa Shepherd	v. Holt Family Practice, P.C., et al.
Dep		Kelli Kilduff	v. Garden City Hospital, et al.
CA		Leonard Smolarkiewicz	v. Mid Michigan Health
Dep		Ayad Hanna	v. William Beaumont Hospital, et al.
Dep		Lisa Huntley	v. Sparrow Hospital, et al.
Dep		Anthony Delafuente	v. Hurley Medical Ctr, et al.
		Estate of Brent Bara	
Dep		Brenda Thomas	v. Henry Ford Hospital v. METRA
Dep			
Dep		Manveen Saluja, M.D. Mia Jermano	v. Honigman Miller Schwartz Cohn, et al.
Dep			v. Greco
Dep		Estate of Robert Vignola, Dec'd	v. Oakwood Health Care
Dep		Larry Plumb	v. Genesys Regional Medical Ctr, et al.
Dep		Nina Moore	v. Botsford General Hospital, et al.
Dep		Matthew Mancina	v. Dr. Shapiro, et al.
Dep		Devin Abood, a Minor	v. Wycoff, D.O., et al.
Dep		Julie Gieske, et al.	v. Peter S. Vasiu, D.O., et al.
Dep		Estate of Matthew Trontl, Dec'd	v. St. John Health
Dep	2015	Aylmer Wright	v. Allegiance Health Services, et al.

Dep	2015	Jayden Harrison	v. Spectrum Health
Dep		John Kudlick	v. Mid-Michigan Heart, et al.
Dep		Noah Bayle, a Minor	v. St. John Hospital and Med. Ctr, et al.
Dep		Shaun Mason	v. U of M and Dr. Gregory Graziano
CA		Stacey White	v. St. Mary's Hospital of MI, PLLC, et al.
Dep		Est. of Sabrie Nash, Minor, Dec'd	v. Children's Hospital of Michigan, et al.
Dep		Victoria Dawkins	v. Saginaw Valley Neurosurgery, et al.
Dep		Richard Stokes	v. McLaren Regional Medical Ctr, et al.
Dep		Estate of Suzanne Fields, Dec'd	v. St. Joseph Mercy Hospital, et al.
		Estate of Robert Cornwell, Dec'd	v. St. John Macomb-Oakland Hosp., et al.
Dep		Sara Plona	
Dep		Wallace Dixon	v. St. Joseph Mercy Oakland, et al.
Dep			v. Henry Ford Hospital, et al.
Dep		Ethan Andrzejewski	v. St. John Macomb Hospital
CA		Estate of Sonya Robards, Dec'd	v. Tri-County Medical Clinic, et al.
Dep		James Davis	v. Philip Bulson and Stat EMS
Dep		Thomas, et al.	v. Horizon Freight System, Inc., et al.
CA		Estate of Suzanne Fields, Dec'd	v. St. Joseph Mercy Hospital, et al.
Dep		Karen Tate	v. St. Joseph Hospital
Dep		William Noe	v. King Technology
Dep		Kenneth McCormick	v. Ford Motor Company
Dep	-	Lana Ennis	v. EPMG, P.C.
Dep		Estate of Michael Powers, Dec'd	v. Genesys Regional Medical Ctr
Dep	2015	Dr. Clemon Pardales, et al.	v. BMW of North America, et al.
Dep	2015	Estate of Paul Johnson, Dec'd	v. Wolschleger, et al.
Dep	2015	Merlean Cavitt	v. Henry Ford Health System
CA	2015	Melvin Ayotte	v. City of Mount Morris
CA	2015	Jennifer Miller-Jones	v. South Haven Health System, et al.
Dep	2015	Estate of Shaun McKinney	v. Rizzo
CA	2015	Estates of Jim and Beth Judson	v. U.S.A.
Dep	2015	Derwin Wiley	v. EJ&E and Wisconsin Central
Dep	2015	Delisa Sincere	v. Henry Ford Health System, et al.
Dep	2015	Mary Brazell	v. John Seiver
Dep	2015	Amanda Maki and Christal Maki	v. Bledsoe
Dep	2015	Estate of Robert Cornwell, Dec'd	v. St. John Macomb-Oakland Hosp., et al.
Dep	2105	Zharyn Tucker, a Minor	v. St. John Hospital, et al.
Dep		Estate of Ricardo Juarez, Dec'd	v. Sparrow Hospital, et al.
Dep	2015	Estate of Randall Palmer, II, Dec'd	v. FedEx Freight, et al.
Dep	2015	Elaine and Terrence Surma	v. Dearborn Surgery Ctr, et al.
Dep	2015	Demauri Houston, a Minor	v. Providence Hospital, et al.
CA	2015	Estate of Karin Sanders, Dec'd	v. Farmbrook Radiology Associates, et al.
Dep	2015	Brenda Carey	v. Aspirus Ontonagon Hospital, Inc., et al.
Dep		Anthony Delbene	v. William Beaumont Hospital, et al.
Dep		Estate of Marcus Hill, Deceased	v. VHS Physicians of Michigan, et al.
Dep		Estate of Richard Homent, Dec'd	v. Frontier Communications
Dep		Estate of Jerome Coliton, Dec'd	v. Providence Hospital, et al.
Dep		Brian Stewart	v. St. Joseph Hospital
Dep		Sean Newson	v. St. John Providence Health Syy., et al.
Dep		Jeffrey Thomas Smith	v. Fabiano Brothers, Inc., et al.
Dep		Alex Hernandez	v. Spectrum Health, et al.
Dep		Antonio Traylor	v. State Farm
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16 Katie I amh	v. Sparrow Hospital, et al.
	v. Grand Trunk Railroad
	v. John Seiver
	v. Providence Hospital, et al.
	v. Hillsdale Community Health Ctr
	v. SMART
-	v. Thomas Blaske
	v. Dr. A King Ang
	v. Bronson Healthcare, et al.
	v. Port Huron Hospital, et al.
	v. Engel
	v. ServPro of Mt. Clemens/New Baltimore
	v. Detroit Receiving Hospital, et al.
	v. Tecumseh Lawn & Landscaping, et al.
	v. St. John Hospital, et al.
-	v. Henry Ford Macomb Hospital
	v. Comprehensive Medical Ctr, PLLC
-	v. USA
	v. Miami Valley Hospital
	v. Sinai-Grace Hospital
	v. Sparrow Hospital, et al.
	v. Oaklawn Hospital, et al.
-	v. Sinai-Grace Hospital, et al.
	v. Mercy Health Partners, et al.
	v. Beaumont Hospital, et al.
	v. Farm Bureau
	n raini Baroad
	v. Detroit Receiving Hospital, et al.
	v. Henry Ford Macomb Hospital, et al.
	v. Beaumont Hospital, et al.
	v. Mercy Health Partners, et al.
	v. Mark Goldberger, D.O., et al.
	v. West Bloomfield Pediatrics, et al.
	v. Children's Hospital of Michigan, et al.
	v. Henry Ford Hospital West Blmfld, et al.
	v. Anesthesia Services Associates, et al.
	v. Yaldo Eye Ctr, et al.
	v. McLaren Medical Ctr
	v. Family Foot Care, P.C., et al.
	v. William Beaumont Hospital, et al.
	v. Northwood OBGYN, P.C., et al.
	v. Ford Motor Co., et al.
	v. Occupational Health Ctrs of MI, P.C.
	v. Michael Powers &City of Lincoln Park
	v. Oaklawn Hospital, et al.
•	v. Michigan Institute of Urology, et al.
	v. Oakwood Hospital and Med Ctr, et al.
·	v. Henry Ford Health System, et al.
	v. Dearborn Surgery Ctr, et al.
16 John Paczkowski, a Minor	v. St. John Macomb-Oakland Hosp., et al.
	16 Katie Lamb 16 Dixon 16 Mary Brazell 16 Demauri Houston, a Minor 16 Izabella Thomas 16 Estate of Sally LaMay, Dec'd 16 William Miller 16 Janet Shaffer 16 Estate of Jason Leising, Dec'd 17 Jane Schlaufman 18 Mitchell 19 Roy Travis 19 Diona Johnson 19 James Kretz 19 Zharyn Tucker, a Minor 19 Estate of David Foerster 19 Estate of Robert Boyd, Deceased 19 Estate of Herbert Redmond, Dec'd 19 Estate of Amy Jill Venticinque 19 Crystal Ann Parker 19 Lily Elias, a Minor 19 Zachary Mason 10 Damiko Lawson, a Minor 10 Estate of Patricia Vannett, Dec'd 10 Murray Eddings 10 Estate of Joshua Naeve 11 Darrell Mehay 11 Carlita Bowers 12 Estate of Emil Cook, Deceased 13 Giuseppe Leone 14 Ja'Quari Denar Clay Barnes 15 Joan Makowski 16 Adrian Davis, a Minor 17 Maxwell Brabb, a Minor 18 Maxwell Brabb, a Minor 19 Napoleon Capili, M.D. 10 Thomas Edward Calnen, II, et al. 11 Nabil Bahora 12 Charlene and Albert Miller 13 Mary Yerman 14 Anthony Delbene 15 Jakob Radtke, a Minor 16 Cynthia and Michael Stover 17 Michael Robertson 18 Calvin Sprinkle 19 Sherita Gray 19 John Boldt and Ava Boldt 10 Estate of Anthony Tamer, Dec'd 11 Elaine and Terrence Surma

Dep	2016 Elona Abdulahd, a Minor	v. Children's Hospital of Michigan, et al.
Dep	2016 Steve Lilly	v. Grand Trunk Railroad
Dep	2016 Estate of William Draheim, Dec'd	v. Dr. Donald Weaver, et al.
Dep	2016 Est. of Emmanuel Ward, Dec'd	v. DTE Energy Company
Dep	2016 Filippo Leone	v. BMI Refractory Services
CA	2016 Steve Lilly	v. Grand Trunk Railroad
Dep	2016 Sara and Kenneth Feavel	v. Bradley Hunter, D.C.
Dep	2016 William Bloom	v. William Beaumont Hospital, et al.
Dep	2016 Estate of Tammy Winiarski, Dec'd	v. Henry Ford Health System, et al.
	2016 Christopher Roach	v. Norfolk Southern
Dep		
Dep	2016 Estate of Megan Kochvar, Dec'd	v. Botsford Hospital, et al.
Dep	2016 Edward Light	v. Henry Ford Health System
Dep	2016 Estate of Vondre Gordon, Dec'd	v. American Airlines, Inc.
Dep	2017 Estate of Mary Jane Boza, Dec'd	v. Regional Cardiology Associates, et al.
CA	2017 Edward Light	v. Henry Ford Health System
Dep	2017 Phillip J. Isaacs	v. Gary Railway and U.S. Steel
Dep	2017 Madelyn Smith	v. Martin Tuma, et al.
Dep	2017 Estate of Steven H. Lingar, Dec'd	v. Mercy Memorial Hospital, et al.
Dep	2017 Valerie Gerbig	v. Aspirus Grand View Hospital, et al.
Dep	2017 Hasler	v. National Air Cargo Group, Inc., et al.
Dep	2017 Estate of Frank Licari, Jr., Dec'd	v. Henry Ford Macomb Hospital, et al.
Dep	2017 Est. of Emmanuel Ward, Dec'd	v. DTE Energy Company
Dep	2017 Wyatt Towery	v. Bronson Methodist Hospital, et al.
Dep	2017 Jason Maxey & Bethany Maxey	v. Botsford General Hospital, et al.
Dep	2017 Estate of Garylyn Langell, Dec'd	v. McLaren Port Huron, et al.
Dep	2017 Eric Abdoo	v. Detroit Medical Ctr, et al.
CA	2017 Madelyn Smith	v. Martin Tuma, et al.
Dep	2017 Elisabeth Khouri and Firas Khouri	v. Harper-Hutzel Hospital, et al.
Dep	2017 Severita Villarreal	v. Manphool Singh Chatta
Dep	2017 Becky Rasdale	v, Heather A. Hedstrom-Lara, M.D.
CA	2017 Calvin Sprinkle	v. Michael Powers & City of Lincoln Park
Dep	2017 Knudson	v. American Steamship Company
Dep	2017 Est. of Margaret Taylor, Dec'd	v. Northern Michigan Urology, P.C.
Dep	2017 Est. of Trudy Mindick, Dec'd	v. Kay Family Practice
Dep	2017 Zachary Hawkins	v. Norfolk Southern Railway Company
Dep	2017 Gerald Moss	v. William Beaumont Hospital, et al.
Dep	2017 Ella Riley	v. Henry Ford Health System, et al.
Dep	2017 Kathy Coy and Scott Coy	v. MI Comprehensive Fertility Ctr, et al.
Dep	2017 Richard Haywood	v, METRA
Dep	2017 Estate of Aura Perez, Deceased	v. Henry Ford Health System
Dep	2017 Michelle Coulter	v. Dr. Kraft, et al.
Dep	2017 Charlie Ransom	v. William Beaumont Hospital, et al.
Dep	2017 Timothy Boggs	v. Jawada Shah, M.D., et al.
Dep	2017 Julie Harris	v. Aspirus Keweenaw Hospital, et al.
Dep	2017 Mark Simpson	v. CSX Transportation, Inc.
Dep	2017 Est. of Keith Aubin, Deceased	v. Providence Park Hospital, et al.
Dep	2017 Edward Nelson & Joyce Nelson	v. U of M Health System, et al.
CA	2017 Est. of Brad Hasler, Deceased	v. National Air Cargo Group, et al.
Dep	2017 Est. of Ronald R. Stewart, Dec'd	v. Spectrum Health Hospitals, et al.
Dep	2017 Est. of Tyler Parsons, Deceased	v. Holland Hospital, et al.
_ <u> </u>	2011 Lot. of Tylor Falsons, Docodsed	v. monana moopital, ot al.

Dep	2017	Calla Moo	v. Shadigian, M.D., et al.
Dep	2017	Shelia Hankins	v. Huron Valley Hospital, et al.
Dep	2017	Est. of Virgil Neubauer, et al.	v. Lynn Patterson, et al.
Dep	2017	Shelly Hiltner	v. Kalamazoo Anesthesiology, et al.
Dep	2017	Est. of Jamie Lynn Burda, Dec'd	v. Lapeer Regional Medical Ctr, et al.
Dep	2017	Est. of Michael Henderson, Dec'd	v. Henry Ford Health System, et al.
Dep	2017	Kamal Dabaja	v. St John Hospital and Medical Ctr, et al.
Dep	2017	Zachary VanStempvoort	v. Spectrum Health, et al.
Dep	2017	Theresa Byrnes	v. Lynwood Manor Healthcare Ctr
Dep	2017	Est. of Timothy Carter, Dec'd	v. Henry Ford Health System
Dep	2017	Faith Degrand	v. Children's Hospital of Michigan, et al.
Dep	2017	Laveta Anderson	v. Harper Hutzel Hospital, et al.
Dep	2017	Joanna Serra & Dominic Serra	v. William Beaumont Hospital, et al.
Dep	2017	John Izzard	v. Norfolk Southern Railway Company
Dep	2017	Joan and Richard Higgins	v. St. John Macomb-Oakland Hosp., et al.
Dep	2017	Est. of Monica Rentfrow, Dec'd	v. Metro Health Hospital, et al.
Dep	2017	Kathleen O'Brien	v. Oakwood Healthcare, et al.
Dep	2017	Chase Smitterberg, a Minor	v. Dr. Susan Mosier-LaClair, M.D.
Dep	2017	Brent Osantoski	v. Huron Gas, LLC
Dep	2017	Gazvoda	v. Dept. of Homeland Security, et al.
CA	2017	Est. of Margaret Taylor, Dec'd.	v. Northern Michigan Urology, P.C., et al.
Dep	2017	Doris Bath	v. MSU Dept. of OBGYN & Reprod. Biology
Dep	2017	Cynthia Gregory & Ocie Gregory	v. St. Joseph Mercy - Oakland, et al.
Dep		Jeremiah John Lake	v. Kenneth Jay Snoek
CA	2017	Joanna Serra and Dominic Serra	v. William Beaumont Hospital, et al.
Dep	2017	Antonietta Coletta	v. Tri-County Medical Clinic, et al.
Dep	2017	Est. of Carolyn Meyer, Dec'd.	v. Intervt'l Pain Management Assoc., et al.
Dep	2017	Est. of Scott Nichols, Dec'd.	v. St. Joseph Mercy Pt. Huron Hosp., et al.
Dep	2017	Kathryn Tietyen	v. BayCare Clinic, et al.
Dep	2017	Est. of Kevin Pitcole, Deceased	v. DMC Medical Group, et al.
Dep	2017	Jesse Gabriel Rivera, a Minor	v. Hurley Medical Ctr, et al.
Dep	2017	Est. of James Schmidt, Incapac'd	v. War Memorial Hospital, et al.
Dep	2017	Darquise Hawkins	v. Sparrow Hospital
Dep	2017	Est. of Charles Maroulis, Dec'd	v. Spectrum Health, et al.
Dep	2017	Jean Boynton	v. St. John Hospital
Dep	2017	William Baird	v. Braun Kendrick, et al.
CA	2017	Murray Eddings	v. William Beaumont Hospital, et al.
CA	2017	Julie Harris	v. Aspirus Keweenaw Hospital, et al.
Dep	2017	Shianna Wilson, et al.	v. Covenant Medical Ctr, Inc., et al.
Dep		Tyler Cannady, a Minor	v. Covenant Medical Ctr, Inc., et al.
Dep	2017	Jean Meier	v. VHS Harper Hutzel
Dep	2017	Thomas O'Brien	v. Mercy Health-St. Mary's, et al.
		Arb = Arbitration Hearing	
		CA = Court Appearance	
		Dep = Deposition	